

No. 16-1039

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

COLONIAL PARKING, INC.,

Petitioner, Cross-Respondent,

v.

NATIONAL LABOR RELATIONS BOARD,

Respondent, Cross-Petitioner.

ON PETITION FOR REVIEW FROM A DECISION AND ORDER OF THE
NATIONAL LABOR RELATIONS BOARD

CASE NO. 05-CA-141241

UNOPPOSED MOTION OF THE PETITIONER, COLONIAL PARKING, INC.,
FOR A 30-DAY EXTENSION OF TIME TO FILE OPENING BRIEF

Colonial Parking, Inc., (“Colonial”), the Petitioner and Cross-Respondent in this matter, respectfully file this Motion pursuant to Federal Rule of Appellate Procedure 26(b) and District of Columbia Rule 27(h) for an extension of time to file its opening brief in this appeal.

1. Petitioner’s brief currently is due on May 25, 2016.
2. Colonial and Elene Gebremariam, the employee upon whose behalf the National Labor Relations Board (“NLRB”) prosecuted the underlying

administrative action in this case, as well as officials in Region 5 of the NLRB, have had productive settlement negotiations which, if successful, would dispose of the instant appeal. The Parties are hopeful that a settlement ultimately will be reached.

3. Therefore, to give the Parties time to conclude settlement discussions, and to avoid expense on both sides, Petitioner is requesting a 30-day extension of time, through and including June 24, 2016, to file its opening brief. Petitioner has not requested or received any previous extension of time in this matter.

4. Counsel for the NLRB, Usha Dheenani, has been notified of this Motion and has indicated that the NLRB does not oppose it.

WHEREFORE, for the reasons stated above, Petitioner respectfully requests that this Court GRANT its request for an extension of 30 days, through and including June 24, 2016, to file its opening brief.

Respectfully submitted,

/s/
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CERTIFICATE OF SERVICE

Pursuant to Fed. R. App. P. 25(c), I hereby certify that on May 9, 2016, I electronically filed the foregoing Motion for Extension with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit by using the Court's CM/ECF system.

The participants in this case are registered CM/ECF users, and service will be accomplished by the appellate CM/ECF system.

/s/
Peter G. Fischer